INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: October 17, 2006

RE: Buckeye Terminals, LLC - Raceway Terminal / 063-21982-00011

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 03/23/06

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Buckeye Terminals, LLC – Raceway Terminal
3230 North Raceway Road
Clermont, Indiana 46234

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F063-21982-00011	
Issued by: Nisha Sizemore, Chief Permit Branch Office of Air Quality	Issuance Date: October 17, 2006 Expiration Date: October 17, 2011

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
A.4 FESOP Applicability [326 IAC 2-8-2]

SECTION B GENERAL CONDITIONS 7
B.1 Definitions [326 IAC 2-8-1]
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-8-6]
B.5 Severability [326 IAC 2-8-4(4)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.7 Duty to Provide Information[326 IAC 2-8-4(5)(E)]
B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
B.12 Emergency Provisions [326 IAC 2-8-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.17 Permit Renewal [326 IAC 2-8-3(h)]
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
B.21 Source Modification Requirement [326 IAC 2-8-11.1]
B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]
B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.24 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]
B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS 16

Emission Limitations and Standards [326 IAC 2-8-4(1)]
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]
C.2 Overall Source Limit [326 IAC 2-8]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]
C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]
C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

TABLE OF CONTENTS (Continued)

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]
C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS 22

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.1.1 FESOP Limits [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 63, Subpart R]
D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]
D.1.3 Gasoline Transport [326 IAC 8-4-7]
D.1.4 Leaks from Transports and Vapor Collection Systems [326 IAC 8-4-9]
D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements
D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 8-4-9]
D.1.7 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
D.1.8 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.1.9 Record Keeping Requirements
D.1.10 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS 28

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.2.1 Storage Vessels [326 IAC 8-4-3]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.2.2 Record Keeping Requirements

Certification Form 30
Emergency Occurrence Form 31
Quarterly Report Form 33-34
Quarterly Deviation and Compliance Monitoring Report Form 35

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary petroleum storage and distribution terminal.

Authorized Individual:	Vice President and General Manager
Source Address:	3230 North Raceway Road, Clermont, Indiana 46234
Mailing Address:	P.O. Box 368, Emmaus, PA 18049
General Source Phone:	(317) 291-0025/(317) 291-6666
SIC Code:	5171
County Location:	Hendricks
Source Location Status:	Non-attainment for 8-hour ozone standard Non-attainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) petroleum product loading rack, identified as FLRACK, constructed in 1979, with VOC emissions controlled by a vapor combustion unit identified as VCU, which was installed in 1994.

(b) One (1) internal floating roof storage tank, identified as T-402, constructed in 1953, storing gasoline, with a capacity of 1,737,792 gallons.

(c) One (1) internal floating roof storage tank, identified as T-802, constructed in 1954, storing gasoline, with a capacity of 3,282,384 gallons.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Activities with emissions equal to or less than the following thresholds: 3 lbs per hour or 15 lbs per day VOC; 5 lbs per day or 1.0 tons per year of a single HAP, and 12.5 lbs per day or 2.5 tons per year of any combination of HAPs, consisting of:

(1) One (1) internal floating roof storage tank, identified as T-31, constructed in 1954, modified in 1995, storing gasoline, with a maximum capacity of 127,302 gallons. [326 IAC 8-4-3]

(2) One (1) internal floating roof storage tank, identified as T-201, constructed in 1953, storing gasoline, with a capacity of 806,022 gallons. [326 IAC 8-4-3]

(3) One (1) internal floating roof storage tank, identified as T-202, constructed in 1953, storing gasoline, with a capacity of 806,022 gallons. [326 IAC 8-4-3]

(4) One (1) internal floating roof storage tank, identified as T-203, constructed in 1953, storing gasoline, with a capacity of 816,480 gallons. [326 IAC 8-4-3]

(5) One (1) internal floating roof storage tank, identified as T-204, constructed in 1953, storing gasoline, with a capacity of 806,106 gallons. [326 IAC 8-4-3]

(6) One (1) fixed roof storage tank, identified as T-401, constructed in 1953, storing distillate, with a capacity of 1,811,166 gallons.

(7) One (1) fixed roof storage tank, identified as T-403, constructed in 1954, storing distillate, with a capacity of 1,809,612 gallons.

(8) One (1) fixed roof storage tank, identified as T-404, constructed in 1953, storing distillate, with a capacity of 1,809,486 gallons.

(9) One (1) fixed roof storage tank, identified as T-801, constructed in 1954, storing distillate, with a capacity of 3,422,412 gallons.

(10) One (1) fixed roof storage tank, identified as T-ADD1, constructed in 1991, storing additive, with a maximum capacity of 10,000 gallons, and venting to stack ADD1.

(11) One (1) fixed roof storage tank, identified as T-ADD2, constructed in 1991, storing additive, with a maximum capacity of 10,000 gallons, and venting to stack ADD2.

(12) One (1) internal floating roof storage tank, identified as T-DR, constructed in 1991, functioning as Avgas Dump Receiver, with a maximum capacity of 12,600 gallons, and venting to stack TDR.

(13) One (1) horizontal storage tank, identified as Lubricity Additive, constructed in 2005, storing additive, with a maximum capacity of 3,000 gallons.

(14) One (1) horizontal storage tank, identified as PD Additive, constructed in 2005, storing additive, with a maximum capacity of 1,000 gallons.

(15) Component losses (valves, pumps, flanges, etc.).

(16) Meter proving, identified as PROVE.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(c) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughput less than twelve thousand (12,000) gallons, consisting of:

(1) One (1) storage tank, identified as Additive-Diesel, constructed in 2000, with a storage capacity of 800 gallons.

(2) One (1) storage tank, identified as Red-Dye, constructed in 1995, with a storage capacity of 120 gallons.

(d) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(e) Degreasing operations that do not exceed 145 gallons per 12 month.

(f) The following equipment related to routine maintenance activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(g) Groundwater oil recovery wells.

(h) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.

(j) Process vessel degassing and cleaning to prepare for internal repairs.

(k) Paved and unpaved roads and parking lots with public access.

(l) Asbestos abatement projects regulated by 326 IAC 14-10.

(m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(n) On-site fire and emergency response training approved by the department.

(o) Filter or coalescer media changeout.

(p) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(q) Farm operations (leased to others).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, 063-21982-00011, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F063-21982-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.15 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year bases, which document all such changes and emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.22 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.24 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two-hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section

D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality

100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) petroleum product loading rack, identified as FLRACK, constructed in 1979, with VOC emissions controlled by a vapor combustion unit identified as VCU, which was installed in 1994.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limits [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 63, Subpart R]

(a) The throughput of gasoline through the loading rack shall be limited to less than 240,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The combined throughput of kerosene and distillate through the loading rack shall be limited to less than 240,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The combined throughput of additives through the loading rack shall be limited to less than 630,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) The Permittee shall control VOC emissions from the loading rack with the vapor combustion unit. The vapor combustion unit shall operate with a minimum VOC capture and control efficiency of 95%.

(e) The Permittee shall control emissions of a single HAP from the loading rack with the vapor combustion unit. The vapor combustion unit shall operate with a minimum single HAP capture and control efficiency of 55%.

(f) The Permittee shall control emissions of a combination of HAPs from the loading rack with the vapor combustion unit. The vapor combustion unit shall operate with a minimum combination of HAPs capture and control efficiency of 55%.

(g) The VOC emissions from the loading rack when handling gasoline shall be limited to less than 0.404 pounds per thousand (1,000) gallons of throughput.

(h) The VOC emissions from the loading rack when handling diesel fuel, kerosene or additive shall be limited to less than 0.01 pounds per thousand (1,000) gallons of throughput.

(i) The emissions of a single HAP from the loading rack when handling gasoline shall be limited to less than 0.078 pounds per thousand (1,000) gallons of throughput.

(j) The emissions of a single HAP from the loading rack when handling diesel fuel, kerosene or additive shall be limited to less than 0.001 pounds per thousand (1,000) gallons of throughput.

(k) The emissions of a combination of HAPs from the loading rack when handling gasoline shall be limited to less than 0.192 pounds per thousand (1,000) gallons of throughput.

(l) The emissions of a combination of HAPs from the loading rack when handling diesel fuel, kerosene or additive shall be limited to less than 0.003 pounds per thousand (1,000) gallons of throughput.

Combined with the VOC emissions from the storage tanks, the sump, tank cleaning, meter proving, the filters, fugitive losses, and all insignificant activities, the total emissions of VOC from the entire source will be less than one hundred (100) tons per twelve (12) consecutive month period, total emissions of a single HAP will be less than ten (10) tons per twelve (12) consecutive month period, and total emissions of a combination of HAPs will be less than twenty-five (25) tons per twelve (12) consecutive month period. These limits will render the requirements of 326 IAC 2-7 (Part 70 Permit Program), and 40 CFR 63, Subpart R not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4:

(a) The Permittee shall not permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

(1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:

(A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 mg/l of VOC to the atmosphere.

(B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

(C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.

(2) Displaced vapors and gases are vented only to the vapor control system.

(3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

(b) If employees of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The Permittee shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this condition.

D.1.3 Gasoline Transport [326 IAC 8-4-7]

Pursuant to 326 IAC 8-4-7:

(a) No owner or operator of a gasoline transport shall cause, allow, or permit the transfer of gasoline between transports and storage tanks that are equipped with a vapor balance system or vapor recovery system unless:

(1) The vapor balance system or vapor recovery system is connected and operating according to manufacturers' specifications;

(2) Gasoline transport compartment hatches are closed at all times during loading operations;

(3) Except as provided in 326 IAC 8-4-9(i) (stack testing) and for sources subject to 40 CFR 60.503(b) (Standards of Performance for New Stationary Sources) or 40 CFR 63.425(a) (National Emission Standards for Hazardous Air Pollutants) requirements, there are no visible leaks, or otherwise detectable leaks (measured at twenty-one thousand (21,000) parts per million as propane as

specified in 40 CFR 63.425(f)(1), in the gasoline transport's pressure/vacuum relief valves, hatch cover, trailer compartments, storage tanks, or associated vapor and liquid lines during loading or unloading; and

(4) The pressure relief valves on gasoline transports are set to release at no less than four and eight-tenths (4.8) kilo Pascals (seven-tenths (0.7) pounds per square inch).

(b) Tank wagons are exempt from vapor balance requirements.

(c) When employees of the bulk gasoline terminal are present to supervise or perform loading, the Permittee shall be responsible for compliance with paragraphs (a)(1) through (a)(3) of this condition. The Permittee shall also ensure that owners of gasoline transports loading at the terminal during unsupervised times comply with this condition.

(d) Gasoline transports must be designed, maintained, and operated so as to be vapor-tight.

D.1.4 Leaks from Transports and Vapor Collection Systems [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9:

(a) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:

(1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425(e), as follows:

(A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H_2O (six (6) inches H_2O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H_2O (one (1) inch H_2O) in five (5) minutes.

(B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:

(i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27 to repressurize the tank to four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.

(ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H_2O (five (5) inches H_2O).

(2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of paragraph (a)(1) of this condition, and retesting to prove compliance with the criteria of paragraph (a)(1) of this condition.

(b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with paragraph (a) and shall provide the Permittee with the most recent valid modified 40 CFR

60, Appendix A, Method 27 test results upon request. The Permittee shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with paragraph (a).

(c) The Permittee shall operate the vapor control system in compliance with the following requirements:

(1) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) Gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H_2O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H_2O) in the gasoline transport;

(B) Except for sources subject to 40 CFR 60.503(b) (Standards of Performance for New Stationary Sources) or 40 CFR 63. 425(a) (National Emission Standards for Hazardous Air Pollutants) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline bulk terminals; and

(C) Avoidable visible liquid leaks during loading or unloading operations at gasoline bulk terminals.

(2) Within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and it control device.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 8-4-9]

(a) Pursuant to 326 IAC 2-8-5(a)(1),(4), the Permittee shall perform outlet VOC testing of the vapor control system (vapor combustor) on the loading rack (FLRACK) using methods approved by the Commissioner in order to verify compliance with the FESOP emission limits of 0.404 pounds VOC per thousand (1,000) gallons of gasoline throughput and 0.01 pounds VOC per thousand (1,000) gallons of diesel fuel, kerosene or additive throughput. This test shall be performed within 180 days of issuance of this permit. If gasoline is not available onsite within this period, then the test shall be performed within 120 days of resuming gasoline throughput at this facility.

(b) Pursuant to 326 IAC 8-4-9, During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in 326 IAC 8-4-9 (d)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be ten thousand (10,000) parts per million methane for all other bulk gas terminals.

D.1.7 Volatile Organic Compounds (VOC)

In order to comply with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the vapor combustion unit for VOC control shall be in operation at all times when loading operations are taking place.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

The vapor control system shall operate at all times that the petroleum product loading rack is operated. The vapor control system shall be interfaced with the loading rack to prevent loading if the control system is not operational. An indicator light shall detect the presence of a pilot flame. This indicator shall be inspected once per day, and the result shall be recorded. If the pilot flame is not present, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

(a) Pursuant to 326 IAC 8-4-9 and in order to document compliance with Condition D.1.4 and D.1.6:

(1) The Permittee shall maintain records of all certification testing. The records shall identify the following:

(A) The vapor balance, vapor collection, or vapor control system.

(B) The date of the test and, if applicable, retest.

(C) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

(2) The owner or operator of a gasoline transport shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:

(A) The gasoline transport.

(B) The type and date of the test and, if applicable, date of retest.

(C) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to IDEM, OAQ and to the Permittee for inspection and review. The IDEM, OAQ shall be allowed to make copies of the test results.

(b) In order to document compliance with Condition D.1.1, the Permittee shall maintain records of the loading rack gasoline, distillates, and additives throughput. The records shall be complete and sufficient to establish compliance with the loading rack throughput limits established in Condition D.1.1.

(c) To document compliance with Condition D.1.4, the Permittee shall maintain records of all certification testing. The records shall identify the following:

(1) The vapor balance, vapor collection, or vapor control system.

(2) The date of the test and, if applicable, retest.

(3) The results of the test and, if applicable, retest.

(d) In order to document compliance with Condition D.1.7, the Permittee shall maintain a log of flame indicator inspections.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(b) One (1) internal floating roof storage tank, identified as T-402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 1,737,792 gallons.

(c) One (1) internal floating roof storage tank, identified as T-802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 3,282,384 gallons.

Insignificant Activities

(a) Activities with emissions equal to or less than the following thresholds: 3 lbs per hour or 15 lbs per day VOC; 5 lbs per day or 1.0 tons per year of a single HAP, and 12.5 lbs per day or 2.5 tons per year of any combination of HAPs, consisting of:

(1) One (1) internal floating roof storage tank, identified as T-31, constructed in 1954, modified in 1995, storing gasoline, with a maximum capacity of 127,302 gallons. [326 IAC 8-4-3]

(2) One (1) internal floating roof storage tank, identified as T-201, constructed in 1953, storing gasoline, with a capacity of 806,022 gallons. [326 IAC 8-4-3]

(3) One (1) internal floating roof storage tank, identified as T-202, constructed in 1953, storing gasoline, with a capacity of 816,480 gallons. [326 IAC 8-4-3]

(4) One (1) internal floating roof storage tank, identified as T-203, constructed in 1953, storing gasoline, with a capacity of 816,480 gallons. [326 IAC 8-4-3]

(5) One (1) internal floating roof storage tank, identified as T-204, constructed in 1953, storing gasoline, with a capacity of 806,106 gallons. [326 IAC 8-4-3]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Storage Vessels [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities), the Permittee shall not permit the use of storage tanks identified T-31, T-201, T-202, T-203, T-204, T-402, and T-802 unless:

(a) The storage tank has been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall.

(b) The storage tank is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(c) All openings, except stub drains, are equipped with covers, lids, or seals such that:

(1) The cover, lid, or seal is in the closed position at all times except when in actual use;

(2) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;

(3) Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Record Keeping Requirements

(a) Pursuant to 326 IAC 8-4-3(d), and in order to document compliance with Condition D.2.1, the Permittee shall maintain records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of any inspections performed on the storage vessels. Such records shall be maintained for a period of two (2) years and shall be made available to the Commissioner upon written request.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Buckeye Terminals, LLC – Raceway Terminal
Source Address: 3230 North Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 368, Emmaus, PA 718049
FESOP No.: F063-21982-00011

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Buckeye Terminals, LLC – Raceway Terminal
Source Address: 3230 North Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 368, Emmaus, PA 718049
FESOP No.: F063-21982-00011

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Buckeye Terminals, LLC – Raceway Terminal
Source Address: 3230 North Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 368, Emmaus, PA 718049
FESOP No.: F063-21982-00011
Facility: Loading Rack (FLRACK)
Parameter: Throughput of Gasoline
Limit: Less than 240,000,000 gallons per twelve (12) month consecutive period, with compliance determined at the end of each month

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Buckeye Terminals, LLC – Raceway Terminal
Source Address: 3230 North Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 368, Emmaus, PA 718049
FESOP No.: F063-21982-00011
Facility: Loading Rack (FLRACK)
Parameter: Throughput of Distillate/Kerosene
Limit: Less than 240,000,000 gallons per twelve (12) month consecutive period, with compliance determined at the end of each month

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Buckeye Terminals, LLC – Raceway Terminal
Source Address: 3230 North Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 368, Emmaus, PA 718049
FESOP No.: F063-21982-00011
Facility: Loading Rack (FLRACK)
Parameter: Throughput of Additive
Limit: Less than 630,000 gallons per twelve (12) month consecutive period, with compliance determined at the end of each month

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Buckeye Terminals, LLC – Raceway Terminal
Source Address: 3230 North Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 368, Emmaus, PA 718049
FESOP No.: F063-21982-00011

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Buckeye Terminals, LLC – Raceway Terminal
Source Location:	3230 North Raceway Road, Clermont, Indiana 46234
County:	Hendricks
SIC Code:	5171
Operation Permit No.:	F063-13882-00011
Operation Permit Issuance Date:	September 21, 2001
Permit Renewal No.:	F063-21982-00011
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Buckeye Terminals, LLC – Raceway Terminal relating to the operation of a stationary petroleum storage and distribution terminal.

History and Background

During the FESOP Renewal process, the source informed IDEM of a change of ownership effective April 1, 2006. The new owner is Buckeye Terminals, LLC – Raceway Terminal.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) petroleum product loading rack, identified as FLRACK, constructed in 1979, with VOC emissions controlled by a vapor combustion unit identified as VCU, which was installed in 1994.

(b) One (1) internal floating roof storage tank, identified as T-402, constructed in 1953, storing gasoline, with a capacity of 1,737,792 gallons.

(c) One (1) internal floating roof storage tank, identified as T-802, constructed in 1954, storing gasoline, with a capacity of 3,282,384 gallons.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Activities with emissions equal to or less than the following thresholds: 3 lbs per hour or 15 lbs per day VOC; 5 lbs per day or 1.0 tons per year of a single HAP, and 12.5 lbs per day or 2.5 tons per year of any combination of HAPs, consisting of:

(1) One (1) internal floating roof storage tank, identified as T-31, constructed in 1954, modified in 1995, storing gasoline, with a maximum capacity of 127,302 gallons. [326 IAC 8-4-3]

(2) One (1) internal floating roof storage tank, identified as T-201, constructed in 1953, storing gasoline, with a capacity of 806,022 gallons. [326 IAC 8-4-3]

(3) One (1) internal floating roof storage tank, identified as T-202, constructed in 1953, storing gasoline, with a capacity of 806,022 gallons. [326 IAC 8-4-3]

(4) One (1) internal floating roof storage tank, identified as T-203, constructed in 1953, storing gasoline, with a capacity of 816,480 gallons. [326 IAC 8-4-3]

(5) One (1) internal floating roof storage tank, identified as T-204, constructed in 1953, storing gasoline, with a capacity of 806,106 gallons. [326 IAC 8-4-3]

(6) One (1) fixed roof storage tank, identified as T-401, constructed in 1953, storing distillate, with a capacity of 1,811,166 gallons.

(7) One (1) fixed roof storage tank, identified as T-403, constructed in 1954, storing distillate, with a capacity of 1,809,612 gallons.

(8) One (1) fixed roof storage tank, identified as T-404, constructed in 1953, storing distillate, with a capacity of 1,809,486 gallons.

(9) One (1) fixed roof storage tank, identified as T-801, constructed in 1954, storing distillate, with a capacity of 3,422,412 gallons.

(10) One (1) fixed roof storage tank, identified as T-ADD1, constructed in 1991, storing additive, with a maximum capacity of 10,000 gallons, and venting to stack ADD1.

(11) One (1) fixed roof storage tank, identified as T-ADD2, constructed in 1991, storing additive, with a maximum capacity of 10,000 gallons, and venting to stack ADD2.

(12) One (1) internal floating roof storage tank, identified as T-DR, constructed in 1991, functioning as Avgas Dump Receiver, with a maximum capacity of 12,600 gallons, and venting to stack TDR.

(13) One (1) horizontal storage tank, identified as Lubricity Additive, constructed in 2005, storing additive, with a maximum capacity of 3,000 gallons.

(14) One (1) horizontal storage tank, identified as PD Additive, constructed in 2005, storing additive, with a maximum capacity of 1,000 gallons.

(15) Component losses (valves, pumps, flanges, etc.).

(16) Meter proving, identified as PROVE.

(b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(c) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughput less than twelve thousand (12,000) gallons, consisting of:

(1) One (1) storage tank, identified as Additive-Diesel, constructed in 2000, with a storage capacity of 800 gallons.

(2) One (1) storage tank, identified as Red-Dye, constructed in 1995, with a storage capacity of 120 gallons.

(d) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(e) Degreasing operations that do not exceed 145 gallons per 12 month.

(f) The following equipment related to routine maintenance activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(g) Groundwater oil recovery wells.

(h) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.

(j) Process vessel degassing and cleaning to prepare for internal repairs.

(k) Paved and unpaved roads and parking lots with public access.

(l) Asbestos abatement projects regulated by 326 IAC 14-10.

(m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(n) On-site fire and emergency response training approved by the department.

(o) Filter or coalescer media changeout.

(p) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(q) Farm operations (leased to others).

Existing Approvals

The source has been operating under the previous FESOP No. 063-13882-00011 issued September 14, 2001, with an expiration date of September 14, 2006. All conditions from previous approvals were incorporated into this FESOP. All previous permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the facts and conditions outlined in this document.

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on November 14, 2005. The source informed IDEM of a change of ownership, effective April 1, 2006, on March 14, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	0.1
PM10	0.2
SO_2	4.4
VOC	996
CO	0.3
NO_x	1.25

HAPs	Unrestricted Potential Emissions (tons/year)
Toluene	17.3
Hexane	15.5
Benzene	8.73
All Others	11.4
Total	52.9

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its VOC emissions below the Title V levels.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of a single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its HAP emissions below the Title V levels.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is

made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

	Potential To Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
FLRACK / VCU***	3.5	3.5	negligible	49.7	76.2	14.2	3.00
Storage Tanks***	0	0	0	24.4	0	0	1.42
Tank Cleaning *	0	0	0	4.6	0	0	0.89
Fittings and Valves *	0	0	0	0.69	0	0	0.53
Meter Proving *	0	0	0	0.16	0	0	0.031
Sump *	0	0	0	0.01	0	0	0.003
Filter *	0	0	0	0.01	0	0	0.002
All Other Insignificant Activities ***	0.1	0.2	4.4	16.7	0.3	1.3	Less than 8
Total Emissions **	3.6	3.6	4.4	Less than 100	76.5	15.5	Single HAP: < 10 Comb. HAPs: < 25

* Potential to emit figures are from FESOP 063-13882-00011.
** Potential to emit of VOC, a single HAP and a combination of HAPs is limited by conditions in the permit.
*** Potential to emit for FLRACK/VCU, storage tanks, and insignificant combustion are from TSD Appendix A, pages 1 through 6.

County Attainment Status

The source is located in Hendricks County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

Note: On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

(a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Hendricks County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the requirements of Emission Offset (326 IAC 2-3). See the State Rule Applicability – Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Hendricks County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(c) Hendricks County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	3.6
PM10	3.7
SO_2	4.4
VOC	Less than 100
CO	76.2
NO_x	14.0
Single HAP	Less than 10
Combination HAPs	Less than 25

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12, 40 CFR 60) included in this permit.

(b) The requirements of the New Source Performance Standards for Storage Vessels For Petroleum Liquids For Which Construction, Reconstruction, Or Modification Commenced After June 11, 1973, And Prior To May 19, 1978 (40 CFR 60, Subpart K, 326 IAC 12) are not included in this permit for storage tanks T-31, T-201, T-202, T-203, T-204, T-401, T-402, T-403, T-404, T-801, and T-802. These tanks were constructed prior to June 11, 1973 and Tank T-31 was modified after May 19, 1978.

(c) The requirements of the New Source Performance Standards for Storage Vessels For Petroleum Liquids For Which Construction, Reconstruction, Or Modification Commenced After June 11, 1973, And Prior To May 19, 1978 (40 CFR 60, Subpart K, 326 IAC 12) are not included in this permit for storage tanks T-ADD1, T-ADD2, T-DR, Lubricity Additive, PD Additive, Additive-Diesel, and Red-Dye. These tanks each have a storage capacity less than 151,412 liters (40,000 gallons), and were constructed after May 19, 1978.

(d) The requirements of the New Source Performance Standards for Storage Vessels For Petroleum Liquids For Which Construction, Reconstruction, Or Modification Commenced After May 18, 1978, And Prior To July 23, 1984 (40 CFR 60, Subpart Ka, 326 IAC 12) are not included in this permit for storage tanks T-31, T-201, T-202, T-203, T-204, T-401, T-

402, T-403, T-404, T-801, and T-802. These tanks were constructed prior to May 18, 1978, and storage tank T-31 was modified after July 23, 1984.

(e) The requirements of the New Source Performance Standards for Storage Vessels For Petroleum Liquids For Which Construction, Reconstruction, Or Modification Commenced After May 18, 1978, And Prior To July 23, 1984 (40 CFR 60, Subpart Ka, 326 IAC 12) are not included in this permit for storage tanks T-ADD1, T-ADD2, T-DR, Lubricity Additive, PD Additive, Additive-Diesel, and Red-Dye because each of these tanks have a storage capacity less than 151,416 liters (40,000 gallons), and were constructed after July 23, 1984.

(f) The requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, Or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb, 326 IAC 12) are not included in this permit for storage tanks T-201, T-202, T-203, T-204, T-401, T-402, T-403, T-404, T-801, and T-802. These tanks were constructed prior to July 23, 1984.

(g) The requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, Or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb, 326 IAC 12) are not included in this permit for storage tank T-31, which was originally constructed in 1954. This storage vessel has a capacity greater than or equal to 151 cubic meters (127,302 gallons = 482 cubic meters) and stores a liquid with a maximum true vapor pressure greater than 3.5 kilopascals (kPa). In 1995, the source added an internal floating roof to this tank to meet the requirements of 326 IAC 8-4-3. However, this alteration to the tank does not meet the definition of “modification” as that term is defined in 40 CFR 60.2. The addition of the internal floating roof resulted in a decrease in the amount of VOC emitted into the atmosphere by this tank.

(h) The requirements of the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, Or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb, 326 IAC 12) are not included in this permit for storage tanks T-ADD1, T-ADD2, T-DR, Lubricity Additive, PD Additive, Additive-Diesel, and Red-Dye because each of these tanks have a storage capacity less than 75 cubic meters.

(i) The requirements of the New Source Performance Standard for Bulk Gasoline Terminals (40 CFR 60, Subpart XX, 326 IAC 12) are not included in this permit for the petroleum product loading rack (FLRACK) because the loading rack was constructed prior to December 17, 1980 and has not been modified or reconstructed since that date.

(j) The requirements of the (National Emissions Standards for Hazardous Air Pollutants for Gasoline Distribution Facilities (40 CFR 63, Subpart R, 326 IAC 20-10) are not included in this permit for the petroleum product loading rack (FLRACK) because this source is not a major source of HAP, as defined in 40 CFR 63, Subpart A . Pursuant to FESOP No. 063-5536-00011, issued on December 10, 1996, the source accepted a limit on the potential to emit for a single HAP of less than 10 tons per year and a limit on the potential to emit for a combination of HAPs of less than 25 tons per year. The source accepted these limits prior to the compliance date for this rule (December 15, 1997).

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T, 326 IAC 20) are not included in the permit for the insignificant degreasing operations because the insignificant degreasing operations do not use a solvent containing methylene chloride, perchlorethylene, trichlorethylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform

or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)

This source is not in 1 of the 28 source categories because although this source is a petroleum storage and transfer unit, the total storage capacity of this entire source is less than 300,000 barrels of petroleum products. There are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, fugitive emissions of VOC and PM are not counted towards applicability of PSD and Emission Offset.

This source was constructed in 1953. At the time of construction, the PTE for VOC was less than 250 tons per year. In 1979, the petroleum product loading rack, identified as FLRACK, was constructed. The potential to emit of this emissions unit is 970 tons per year of VOC. At the time that the PSD rules were promulgated in 1980, the potential to emit of VOC of the entire source was greater than 250 tons per year and the source was a major source under PSD.

In 1991, the storage tanks identified as T-ADD1, T-ADD2 and T-DR were constructed. This modification did not trigger PSD review because the increase in potential to emit of VOC due to this modification (0.67 tons per year) was less than the PSD significant level (40 tons per year). The source was a major source under PSD after this modification.

In 1994, the source installed a vapor combustion unit on the petroleum loading rack. The increase in potential to emit of carbon monoxide (CO) due to this addition was 76.2 tons per year. The increase in potential to emit of NOx due to this modification was 14.2 tons per year. The increase in potential to emit of PM and PM10 due to this modification was 3.5 tons per year. The actual emissions of VOC for the entire source decreased by 923 tons per year due to the addition of the vapor combustion unit. This modification did not trigger PSD review because the increases in potential to emit of PM, PM10, CO and NOx were below the PSD significant level. The source was a major source under PSD after this modification.

In 1995, the source modified the storage tank identified as T-31 by adding an internal floating roof and added the storage tank identified as Red-Dye. The addition of the internal floating roof to tank T-31 resulted in a decrease in the potential to emit of VOC of approximately 31 tons per year, because this technology reduces the petroleum liquid surface area from which vapors can originate. The addition of the additive tank resulted in a negligible increase in potential to emit for VOC, because this is a small tank (120 gallons) containing a liquid of low volatility. This modification resulted in a negligible increase in potential to emit of VOC. This modification did not trigger PSD review because the increase in potential to emit of VOC (less than 0.01 tons per year) was less than the PSD significant level (40 tons per year). The source was a major source under PSD after this modification.

In FESOP 063-5536-00011, issued on December 10, 1996, the source accepted a limit on the potential to emit of VOC of less than 100 tons per year in order to become a FESOP source. Since PSD review was not triggered by any previous modifications, the source was able to take a PSD minor limit. After issuance of this permit, the limited potential to emit of the entire source was less than 100 tons per year for PM, PM_{10}, VOC, CO, NO_x, and SO_2. Therefore, the source was a minor source under PSD for future modifications after issuance of the FESOP.

This source is located in Hendricks County. Hendricks County was designated as a nonattainment area for the 8-hour ozone standard on June 15, 2004. The potential to emit of VOC at this source, after limits, is less than 100 tons per year. Therefore, this source is a minor source under 326 IAC 2-3 (Emission Offset).

In 2005, the source added two insignificant storage tanks identified as Lubricity Additive and PD Additive. This modification resulted in a negligible (less than 0.1 tons per year) increase in potential to emit of VOC. This modification did not trigger PSD review because the increase in potential to emit of VOC due to this modification (0.004 tons per year) was less than the Emission Offset significant level (100 tons per year). The source was a minor source under PSD and Emission Offset after this modification.

After FESOP limits and controls, the potential to emit of the entire source is less than 100 tons per year for PM, PM_{10}, VOC, CO, NO_x, and SO_2. The source is a minor source under PSD and Emission Offset for any future modifications.

326 IAC 2-3 (Emission Offset)

Hendricks County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. Buckeye Terminals, LLC – Raceway Terminal has a potential to emit of PM10 below 100 tpy and has made no modifications to the source after January 5, 2005 that resulted in an increase in PM10 emissions. Therefore, 326 IAC 2-3 does not apply for PM2.5.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source has not installed any new major sources of HAPs after July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Hendricks County and has voluntarily agreed to limit the potential to emit of VOC and HAP to less than major source levels. Therefore, the source is not required to operate under a Part 70 (Title V) permit and the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8 (FESOP)

(a) The throughput of gasoline through the loading rack shall be limited to less than 240,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The combined throughput of kerosene and distillate through the loading rack shall be limited to less than 240,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The combined throughput of additives through the loading rack shall be limited to less than 630,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) The Permittee shall control VOC emissions from the loading rack with the vapor combustion unit. The vapor combustion unit shall operate with a minimum VOC capture and control efficiency of 95%.

(e) The Permittee shall control emissions of a single HAP from the loading rack with the vapor combustion unit. The vapor combustion unit shall operate with a minimum single HAP capture and control efficiency of 55%.

(f) The Permittee shall control emissions of a combination of HAPs from the loading rack with the vapor combustion unit. The vapor combustion unit shall operate with a minimum combination of HAPs capture and control efficiency of 55%.

(g) The VOC emissions from the loading rack when handling gasoline shall be limited to less than 0.404 pounds per thousand (1,000) gallons of throughput.

(h) The VOC emissions from the loading rack when handling diesel fuel, kerosene or additive shall be limited to less than 0.01 pounds per thousand (1,000) gallons of throughput.

(i) The emissions of a single HAP from the loading rack when handling gasoline shall be limited to less than 0.078 pounds per thousand (1,000) gallons of throughput.

(j) The emissions of a single HAP from the loading rack when handling diesel fuel, kerosene or additive shall be limited to less than 0.001 pounds per thousand (1,000) gallons of throughput.

(k) The emissions of a combination of HAPs from the loading rack when handling gasoline shall be limited to less than 0.192 pounds per thousand (1,000) gallons of throughput.

(l) The emissions of a combination of HAPs from the loading rack when handling diesel fuel, kerosene or additive shall be limited to less than 0.003 pounds per thousand (1,000) gallons of throughput.

Combined with VOC emissions from the storage tanks, the sump, tank cleaning, meter proving, the filter, fugitive losses, and all insignificant activities, the total emissions of VOC from the entire source will be less than one hundred (100) tons per twelve (12) consecutive month period, total emissions of a single HAP will be less than ten (10) tons per twelve (12) consecutive month period, and total emissions of a combination of HAPs will be less than twenty-five (25) tons per twelve (12) consecutive month period. These limits will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 40 CFR 63, Subpart R not applicable. These limits make the source a minor source under 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Loading Rack and StorageTanks

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The requirements of 326 IAC 6-3-2 do not apply to the vapor combustion unit. Pursuant to 326 IAC 6-3-1(b)(2), the incineration of volatile vapors at the flare is not considered a manufacturing process.

326 IAC 8-1-6 (New Facilities)

(a) The requirements of 326 IAC 8-1-6 are not applicable to the emission units identified as T-401, T-403, T-404, and T-801 because these emission units were constructed prior to January 1, 1980.

(b) The requirements of 326 IAC 8-1-6 are not applicable to the emission units identified as T-31, T-ADD1, T-ADD2, T-DR, Lubricity Additive, PD Additive, Additive-Diesel, and Red-Dye because the potential to emit of VOC from these emission units is less than twenty-five (25) tons per year.

(c) The requirements of 326 IAC 8-1-6 are not applicable to the emission units identified as FLRACK, T-31, T-201, T-202, T-203, T-204, T-402, and T-802 because these emission units are subject to another Article 8 rule. Tanks T-31, T-201, T-203, T-204, T-402 and T-802 are subject to 326 IAC 8-4-3. The loading rack (FLRACK) is subject to 326 IAC 8-4-4.

326 IAC 8-4-2 (Petroleum Sources - Petroleum Refineries)

The requirements of 326 IAC 8-4-2 (Petroleum Sources - Petroleum Refineries) do not apply to this source because this source is not a petroleum refinery. This source stores petroleum compounds.

326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities)

(a) The petroleum liquid storage tanks identified as T-31, T-201, T-202, T-203, T-204, T-402, and T-802 are subject to the requirements of 326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities) because these tanks are located in Hendricks County, the capacity of these tanks is greater than 39,000 gallons and these tanks store volatile organic compounds with true vapor pressures greater than 1.52 psia. The Permittee shall comply with the requirements of 326 IAC 8-4-3 by using internal floating roofs equipped with a closure seal(s) and maintaining the tanks pursuant to the requirements of 326 IAC 8-4-3(b)(1) as follows:

(1) The Permittee shall not use an affected fixed roof tank unless:

(A) The facility has been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.

(B) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

(C) All openings, except stub drains, are equipped with covers, lids, or seals such that:

(i) The cover, lid, or seal is in the closed position at all times except when in actual use;

(ii) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;

(iii) Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Pursuant to 326 IAC 8-4-3(d) the Permittee shall maintain records of the types of volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels. Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

(b) The petroleum liquid storage tanks identified as T-401, T-403, T-404, and T-801, are not subject to the requirements of 326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities). These tanks are located in Hendricks County and the capacity of these tanks is greater than 39,000 gallons. However, these tanks store volatile organic compounds with true vapor pressures less than 1.52 psia.

(c) The petroleum liquid storage tanks identified as T-ADD1, T-ADD2, T-DR, Lubricity Additive, PD Additive, Additive Diesel and Red-Dye are not subject to the requirements of 326 IAC 8-4-3 because the capacity of these tanks is less than 39,000 gallons each.

326 IAC 8-4-4 (Petroleum Sources - Bulk Gasoline Terminals)

The loading rack (FLRACK) is subject to the requirements of 326 IAC 8-4-4 (Petroleum Sources - Bulk Gasoline Terminals) because this source is a bulk gasoline terminal and located in Hendricks County. Pursuant to 326 IAC 8-4-4, the Permittee shall:

(a) The Permittee shall not permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

(1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:

(A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 mg/l of VOC to the atmosphere.

(B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

(C) An approved control system, demonstrated to have control efficiency equivalent to or greater than paragraph (A) above.

(2) Displaced vapors and gases are vented only to the vapor control system.

(3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

(b) If employees of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The Permittee shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this condition.

326 IAC 8-4-5 (Petroleum Sources - Bulk Gasoline Plants)

This source is not subject to the requirements of 326 IAC 8-4-5 (Petroleum Sources - Bulk Gasoline Plants) because this source is not a bulk gasoline plant as defined in 326 IAC 1-2-7.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

This source is not subject to the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities) because this source does not dispense gasoline into motor vehicle fuel tanks or portable containers. This source dispenses gasoline into trucks which transport the gasoline to various gasoline dispensing facilities.

326 IAC 8-4-7 (Petroleum Sources - Gasoline Transports)

This source is subject to the requirements of 326 IAC 8-4-7 (Petroleum Sources - Gasoline Transports) because this source is located in Hendricks County and gasoline is transferred between transports and storage tanks at the source. Pursuant to 326 IAC 8-4-7:

(a) No owner or operator of a gasoline transport shall cause, allow, or permit the transfer of gasoline between transports and storage tanks that are equipped with a vapor balance system or vapor recovery system unless:

(1) The vapor balance system or vapor recovery system is connected and operating according to manufacturers' specifications;

(2) Gasoline transport compartment hatches are closed at all times during loading operations;

(3) Except as provided in 326 IAC 8-4-9(i) of this rule (stack testing), there are no visible leaks, or otherwise detectable leaks (measured at twenty-one thousand (21,000) parts per million as propane as specified in 40 CFR 63.425(f)(1), in the gasoline transport's pressure/vacuum relief valves, hatch cover, trailer compartments, storage tanks, or associated vapor and liquid lines during loading or unloading; and

(4) The pressure relief valves on gasoline transports are set to release at no less than four and eight-tenths (4.8) kilo Pascals (seven-tenths (0.7) pounds per square inch).

(b) Tank wagons are exempt from vapor balance requirements.

(c) When employees of the bulk gasoline terminal are present to supervise or perform loading, the owner of the terminal shall be responsible for compliance with subsection (a)(1) through (a)(3). The owner of the terminal shall also ensure that owners of gasoline transports loading at the terminal during unsupervised times comply with this section.

(d) Gasoline transports must be designed, maintained, and operated so as to be vapor-tight.

(e) Transfer of gasoline between a gasoline transport and a storage tank that is not equipped with a vapor balance system or vapor recovery system is not subject to this section.

326 IAC 8-4-8 (Petroleum Sources - Leaks from Petroleum Refineries; Monitoring; Reports)

This source is not subject to the requirements of 326 IAC 8-4-8 (Petroleum Sources - Leaks from Petroleum Refineries; Monitoring; Reports) because this source is not a Petroleum Refinery. This source stores petroleum compounds.

326 IAC 8-4-9 (Petroleum Sources - Leaks from Transports and Vapor Collection Systems; Records)

This source is subject to the requirements of 326 IAC 8-4-8 (Petroleum Sources - Leaks from Transports and Vapor Collection Systems; Records) because the source is located in Hendricks County and is subject to 326 IAC 8-4-4 and 326 IAC 8-4-7. Pursuant to 326 IAC 8-4-9:

(a) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:

(1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425(e), as follows:

(A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H_2O (six (6) inches H_2O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H_2O (one (1) inch H_2O) in five (5) minutes.

(B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:

(i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27 to repressurize the tank to four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.

(ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H_2O (five (5) inches H_2O).

(2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).

(b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27 test results upon request. The Permittee shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (b).

(c) For the vapor balance system or vapor control system subject to this rule, the Permittee shall:

(1) Design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) Gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H_2O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H_2O) in the gasoline transport;

(B) Except for sources subject to 40 CFR 60.503(b) (Standards of Performance for New Stationary Sources) or 40 CFR 63. 425(a) (National Emission Standards for Hazardous Air Pollutants) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved

by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(C) Avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(2) Within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).

(d) IDEM, OAQ may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (b) or (c).

(e) The Permittee shall maintain records of all certification testing. The records shall identify the following:

(1) The vapor balance, vapor collection, or vapor control system.

(2) The date of the test and, if applicable, retest.

(3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

(f) The owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:

(1) The gasoline transport.

(2) The type and date of the test and, if applicable, date of retest.

(3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to IDEM, OAQ and to the Permittee for inspection and review. IDEM, OAQ shall be allowed to make copies of the test results.

(g) If the commissioner allows alternative test procedures in paragraphs (b)(1) or (d)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

(h) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in paragraph (d)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be ten thousand (10,000) parts per million methane for all other bulk gas terminals.

326 IAC 8-6 (Volatile Organic Compounds)

This source is located in Hendricks County and commenced operation prior to October 7, 1974. Therefore, the requirements of 326 IAC 8-6 do not apply.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is located in Hendricks County and this rule applies to sources located in Clark, Floyd, Lake, or Porter Counties.

State Rule Applicability – Insignificant Activities

326 IAC 8-3-2 (Cold Cleaner Operations)
The cold cleaner degreasing facility is located in Hendricks County and was constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-3-2 do not apply.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)
The cold cleaner degreasing facility is located in Hendricks County and was constructed prior to January 1, 1990. Therefore, the requirements of 326 IAC 8-3-5 do not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 2-7-1(40)(E)(iii), the brazing equipment, cutting torches, soldering equipment, welding equipment used for plant maintenance are considered to be trivial activities. Therefore, the requirements of 326 IAC 6-3-2 do not apply.

Testing Requirements

Pursuant to 326 IAC 2-8-5(a)(1),(4), the Permittee shall perform outlet VOC testing of the vapor control system (vapor combustor) on the loading rack (FLRACK) using methods approved by the Commissioner in order to verify compliance with the FESOP emission limits. This test shall be performed within 180 days of issuance of this permit. If gasoline is not available onsite within this time period, then the test shall be performed within 120 days of resuming gasoline throughput at this facility.

The VOC testing is necessary to determine if the vapor combustor is functioning according to design specifications and is keeping total VOC and HAP emissions at this source below the limits imposed by the FESOP permit.

Testing for a single HAP or a combination of HAPs is not necessary. Compliance with the VOC control efficiency will ensure that actual emissions of a single HAP and a combination of HAPs are below the FESOP limit. Based on calculations, the vapor combustion unit need only achieve a 55% destruction efficiency for a single HAP (Toluene) to achieve compliance with the FESOP limit for a single HAP, and the vapor combustion unit need only achieve a 55% destruction efficiency for a combination of HAPs to achieve compliance with the FESOP limit for a combination of HAPs.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will

arise through a source's failure to take the approporiate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The loading rack (FLRACK) and vapor combustion unit (VCU) has applicable compliance monitoring conditions as specified below:

   The vapor combustion unit shall operate at all times that the petroleum product loading rack is operated. The vapor control system shall be interfaced with the loading rack to prevent loading if the control system is not operational. An indicator light shall detect the presence of a pilot flame. This indicator shall be inspected once per day, and the result shall be recorded. The vapor combustion unit shall maintain a 3-hour average minimum operating temperature of 1400 deg. F or a temperature, determined in the most recent compliance tests to maintain an overall control efficiency of 95%. The Permittee shall maintain a log of flame indicator inspections.

   These monitoring conditions are necessary because the vapor combustion unit for the loading rack must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) limits and the minor source limits for 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset).

Conclusion

The operation of this stationary petroleum storage and distribution terminal shall be subject to the conditions of the FESOP Renewal No.: 063-21982-00011.

Appendix A: Emission Calculations
VOC Emissions from Truck Loading Rack

Company Name: Buckeye Terminals, LLC - Raceway Terminal
Address: 3230 North Raceway Road, Clermont, Indiana 46234
FESOP: F063-21982-00011
Reviewer: ERG/ST
Date: July 10, 2006

Potential To Emit from Truck Loading/Unloading Operation - Gasoline

Material	Limited Throughput	Emission Factor	PTE of VOC Before Controls	PTE of VOC After Controls
	(gals/year)	(lbs/10^3 gal)	(tons/year)	(tons/year)
Gasoline	240,000,000	8.08	970	48.5

The emission factor for tank truck loading losses is calculated using the formula from AP-42, Chapter 5.2 - Transportation and Marketing of Petroleum Liquids.

L_L = 12.46 SPM/T
where :
L_L = Loading Loss (lb/10^3 gallon of gasoline)

M = Molecular weight of vapors	M = 66.67
P = true vapor pressure of liquid loaded, psia	P = 5.0
T = temperature of liquid loaded (^{o}F + 460)	Average temperature of dispensed liquid = 54 ^{o}F
S = saturation factor	S = 1 : dedicated vapor balance service

The average temperature of dispensed liquids is 54 degres Fahrenheit. (EPA-450/3-91-022a (11/91)).
Vapor Molecular Weight and True Vapor Pressure are from AP-42, Chapter 7.1 - Liquid Storage Tanks, Table 7.1-2. (9/97)

Overall VOC control efficiency (from FESOP Limit) = 95.0%

Methodology
Limited Throughput (gals/year) = 240,000,000 gallons per year (FESOP limit)
PTE of VOC Before Controls (tons/year) = Limited Throughput (gals/year) x Emission factor (lbs/1000 gallons) x 1 ton/2000 lbs
PTE of VOC After Controls (tons/year) = PTE of VOC Before Controls (tons/year) x (1- Control Efficiency %)

Appendix A: Emission Calculations
VOC Emissions from Truck Loading Rack

Company Name: Buckeye Terminals, LLC - Raceway Terminal
Address: 3230 North Raceway Road, Clermont, Indiana 46234
FESOP: F063-21982-00011
Reviewer: ERG/ST
Date: July 10, 2006

Potential To Emit from Truck Loading/Unloading Operation - Distillates and Additive

Material	Limited Throughput	Emission Factor	PTE of VOC Before Controls	PTE of VOC After Controls
	(gals/year)	(lbs/10^3 gal)	(tons/year)	(tons/year)
Diesel Fuel	240,000,000	0.014	1.68	0.084
Kerosene		0.016	1.92	0.096
Additive	630,000	0.016	0.005	2.52E-04

The emission factor for tank truck loading losses is calculated using the formula from AP-42, Chapter 5.2 - Transportation and Marketing of Petroleum Liquids. Kerosene is chosen as worst case scenario.

Emission Factors for Diesel Fuel and Kerosene are from AP-42, Transportation and Marketing of Petroleum Liquids, Table 5.2-5 (1/95).
There is no emission factor available for Additive. Assume additive emission factor is equivalent to kerosene.
Overall VOC control efficiency (from FESOP Limit) = 95%

Methodology
Limited Throughput Distillate (gals/year) = 240,000,000 gallons per year (FESOP limit)
Limited Throughput Additive (gals/year) = 630,000 gallons per year (FESOP limit)
PTE of VOC Before Controls (tons/year) = Limited Throughput (gals/year) x Emission factor (lbs/1000 gallons) x 1 ton/2000 lbs
PTE of VOC After Controls (tons/year) = PTE of VOC Before Controls (tons/year) x (1 - Control Efficiency %)

Appendix A: Emission Calculations
VOC Emissions from Tanks

Company Name: Buckeye Terminals, LLC - Raceway Terminal
Address: 3230 North Raceway Road, Clermont, Indiana 46234
FESOP: F063-21982-00011
Reviewer: ERG/ST
Date: July 10, 2006

Tank ID #	Fuel	Roof Type	Maximum Storage Capacity (gals)	Limited Annual Throughput (gals/year)	Maximum Hourly Throughput (gals/hour)	Annual Working Losses (lbs/year)	Annual Standing Losses (lbs/year)	Year Constructed	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)
T-31	Gasoline	Internal Floating	127,302	240,000,000	18,000	151	1362.0	1954	0.17	0.76
T-201	Gasoline	Internal Floating	806,022		30,000	754	3862.0	1953	0.54	2.31
T-202	Gasoline	Internal Floating	806,022		90,000	764	4648.0	1953	0.82	2.71
T-203	Gasoline	Internal Floating	816,480		30,000	767	2693.0	1953	0.40	1.71
T-204	Gasoline	Internal Floating	806,106		30,000	767	4648.0	1953	0.63	2.71
T-402	Gasoline	Internal Floating	1,737,792		36,000	571	5857.0	1953	0.75	3.21
T-802	Gasoline	Internal Floating	3,282,792		90,000	432	9599.0	1954	1.28	5.02
T-DR	Gasoline	Internal Floating	12,600		5,000	0.00	1303.0	1991	0.25	0.65
T-401	Distillate	Fixed	1,811,166	240,000,000	72,000	2,041	266.0	1953	0.03	1.15
T-403	Distillate	Fixed	1,809,612		90,000	2,044	267.0	1954	0.03	1.16
T-404	Distillate	Fixed	1,809,486		30,000	2,004	266.0	1953	0.03	1.15
T-801	Distillate	Fixed	3,422,412		90,000	3,093	509.0	1954	0.06	1.80
T-ADD1	Additive 1	Fixed	10,000	630,000	10,000	9.00	2.0	1991	0.00	0.01
T-ADD2	Additive 1	Fixed	10,000		10,000	9.00	2.0	1991	0.00	0.01
Lubricity	Additive 2	Fixed	3,000		10,000	4.29	0.6	2005	0.07	0.00
PD Additive	Additive 2	Fixed	1,000		10,000	2.99	0.2	2005	0.05	0.00
							Total VOC Emissions (tons/year)			**24.4**

Storage Tank Emissions are calculated using EPA's TANKS 4.09 and information provided by the source.
PTE of VOC for storage tanks is from TANKS 4.09

Appendix A: Emission Calculations
HAP Emissions from Truck Loading Racks and Tanks

Company Name: Buckeye Terminals, LLC - Raceway Terminal
Address: 3230 North Raceway Road, Clermont, Indiana 46234
FESOP: F063-21982-00011
Reviewer: ERG/ST
Date: July 10, 2006

	Emission Factors (lb HAP/lb liquid)								
	Hexane	Benzene	Toluene	Methanol	Xylenes	Naph-thalene	MTBE	Cumene	Ethyl benzene
Gasoline	0.016	0.009	0.018	0.0	0.005	0.0	0.004	1.E-04	0.001
Kerosene	0.0004	0.018	0.002	0.0	0.010	0.015	0.0	0.0	0.0
Additive 1	0.0	0.005	0.031	0.108	0.014	6.E-05	0.0	0.001	0.006
Additive 2	0.016	0.009	0.018	0.0	0.005	0.0	0.0043	0.0001	0.001

		PTE of HAP After Controls (tons/year)										
Facility/ Tank ID #	Fuel Type	PTE of VOC After Controls (tons/year)	Hexane	Benzene	Toluene	Methanol	Xylenes	Naph-thalene	MTBE	Cumene	Ethyl benzene	Total HAPs After Controls (tons/year)
T-31	Gasoline	0.76	0.012	0.007	0.014		0.004		0.003	0.000	0.001	0.040
T-201	Gasoline	2.31	0.037	0.021	0.041		0.012		0.010	0.000	0.002	0.123
T-202	Gasoline	2.71	0.043	0.024	0.048		0.014		0.012	0.000	0.003	0.144
T-203	Gasoline	1.71	0.027	0.015	0.030		0.009		0.007	0.000	0.002	0.091
T-204	Gasoline	2.71	0.043	0.024	0.048		0.014		0.012	0.000	0.003	0.144
T-402	Gasoline	3.21	0.051	0.029	0.057		0.016		0.014	0.000	0.003	0.171
T-802	Gasoline	5.02	0.080	0.045	0.089		0.025		0.021	0.001	0.005	0.267
T-DR	Gasoline	0.65	0.010	0.006	0.012		0.003		0.003	0.000	0.001	0.035
T-401	Distillate	1.15	4.6E-04	0.021	0.002		0.012	0.017				0.052
T-403	Distillate	1.16	4.6E-04	0.021	0.002		0.012	0.017				0.052
T-404	Distillate	1.15	4.6E-04	0.021	0.002		0.012	0.017				0.052
T-801	Distillate	1.80	0.001	0.032	0.003		0.018	0.027				0.081
T-ADD1	Additive 1	0.01		4.8E-05	3.1E-04	1.1E-03	1.4E-04	6.1E-07		6.6E-06	5.7E-05	0.002
T-ADD2	Additive 1	0.01		4.8E-05	3.1E-04	1.1E-03	1.4E-04	6.1E-07		6.6E-06	5.7E-05	0.002
Lubricity	Additive 2	0.002	3.9E-05	2.2E-05	4.3E-05		1.2E-05		1.0E-05	3.1E-07	2.4E-06	1.3E-04
PD Additive	Additive 2	0.002	2.5E-05	1.4E-05	2.8E-05		7.9E-06		6.8E-06	2.1E-07	1.6E-06	8.4E-05
FLRACK	Gasoline	48.5	0.776	0.436	0.863		0.242		0.207	0.006	0.048	2.58
FLRACK	Distillate	0.096	3.8E-05	0.002	1.7E-04		0.001	0.001				0.004
FLRACK	Additive 1	0.00021		1.0E-06	6.5E-06	2.3E-05	2.8E-06	1.3E-08		1.4E-07	1.2E-06	3.4E-05
FLRACK	Additive 2	0.00004	6.7E-07	3.8E-07	7.5E-07		2.1E-07		1.8E-07	5.5E-09	4.2E-08	2.2E-06
						Total HAPs Emissions After Controls =						**3.84**

		PTE of HAP Before Controls (tons/year)										
Facility/ Tank ID #	Fuel Type	PTE of VOC Before Controls (tons/year)	Hexane	Benzene	Toluene	Methanol	Xylenes	Naph-thalene	MTBE	Cumene	Ethyl benzene	Total HAPs Before Controls (tons/year)
Tanks	Same as Above											1.26
FLRACK	Gasoline	970	15.5	8.73	17.3		4.85		4.13	0.13	0.97	51.6
FLRACK	Distillate	1.92	0.001	0.035	0.003		0.019	0.029				0.087
FLRACK	Additive 1	0.004		2.0E-05	1.3E-04	4.5E-04	5.7E-05	2.6E-07		2.8E-06	2.4E-05	0.001
FLRACK	Additive 2	0.001	1.3E-05	7.6E-06	1.5E-05		4.2E-06		3.6E-06	1.1E-07	8.4E-07	0.000
						Total HAPs Emissions Before Controls =						**52.9**

HAP content of Kerosene and Diesel Fuel is from Material Safety Data Sheets.
HAP content of gasoline and additives is provided by source.
Technical Guidance - Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities.
Overall VOC control efficiency for HAP emissions from loading rack (FLRACK) (from FESOP Limit) = 95%

Methodology
PTE of VOC (tons/year) from Appendix A: pages 1, 2 and 3
PTE of HAPs Before Controls (tons/year) = PTE of VOC (tons/year) x Emission Factor (lb HAP/lb liquid)
PTE of HAPs After Controls (tons/year) = PTE of HAP Before Controls (tons/year) x (1 - Control Efficiency %)

Appendix A: Emission Calculations
Combustion Emissions - Loading Rack Vapor Combustion Unit (VCU)

Company Name: Buckeye Terminals, LLC - Raceway Terminal
Address: 3230 North Raceway Road, Clermont, Indiana 46234
FESOP: F063-21982-00011
Reviewer: ERG/ST
Date: July 10, 2006

Maximum Fuel Input (MMBtu/hr)
47

Pollutant Emission Factors (lb/MMBtu)			
PM/PM10[a]	PM10[a]	NOx[b]	CO[b]
0.017	0.017	0.068	0.37

Potential To Emit (tons/year)			
PM	PM10	NOx	CO
3.50	**3.50**	**14.0**	**76.2**

Assume PM emissions are equal to PM10 emissions.

[a] Emission factor for PM/PM10 is from AP-42, Chapter 2.4 - Municipal Solid Waste Landfills, Table 2.4-4 - Flares. (AP-42, 11/98)
Assume one dscf of methane has a heat value of 1,000 Btu.
PM/PM10 emission factor = 17 lb/10^6 dscf methane x 1 dscf methane/1,000 Btu = 0.017 lb/10^6 Btu
[b] Emission factors for NOx and CO are from AP-42 - Chapter 13.5 - Industrial Flares, Table 13.5-1 (AP-42, 9/91)
Controlled VOC emissions from loading of gasoline and distillate are calculated on pages 1 and 2 of Appendix A.

Methodology
PTE (tons/year) = Maximum Fuel Input (MMBtu/hour) x Emission Factor (lb/MMBtu) x 8760 (hours/year) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Combustion Emissions - Insignificant Fuel Oil Combustion

Company Name: Buckeye Terminals, LLC - Raceway Terminal
Address: 3230 North Raceway Road, Clermont, Indiana 46234
FESOP: F063-21982-00011
Reviewer: ERG/ST
Date: July 10, 2006

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
2	125	0.5

	Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO	HAPs
Emission Factor in lb/kgal	2.0	3.3	71 *(142.0S)*	20.0	0.34	5.0	4.90E-05
Potential Emission in tons/yr	0.13	0.21	4.44	1.25	0.02	0.31	3.1E-06

* PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM and PM10 combined.
1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

Methodology
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x 1kgal per 1000 gallon x 1 gal per 0.140 MMBtu
PTE (tons/year) = Throughput (kgals/ year) x Emission Factor (lbs/kgal) x 1 ton/2,000 lbs